RECEIVED
CENTRAL FAX CENTER

NOV 2 1 2006

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application:

Appl. No.	:	10/694,503	Confirmation No.:2665
Applicant	:	Surya Sagi, et al.	
Filed	:	October 24, 2003	
Art Unit	:	2168	
Examiner	:	Morrison, J.A.	
Attorney Docket No.	:	F-591-01	
Customer No.	:	00919	Date: November 21, 2006

PRE-APPEAL BRIEF CONFERENCE REQUEST

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Applicants request this pre-appeal review to consider the Examiner's rejections of claims 1-16 in a Office Action dated August 22, 2006. A Notice of Appeal is filed herewith.

CERTIFICATE OF FACSIMILE

I hereby certify that this correspondence is being faxed to the United States Patent and Trademark Office. Attn. Examiner: Jay A. Morrison - on Fax No.: 571-273-8300

on November 21, 2006
Date of Deposit

Marlene Massop
Name


Signature

November 21, 2006
Date

Listing of Claims:

1. (previously presented) A system for gathering and transmitting detailed inserter machine data to one or more clients, the system comprising:

an inserter controller gathering machine data, the controller programmed to gather predetermined machine data comprising substantially all significant machine data from machine sensors and control routines;

a journal storage system configured to store machine data gathered by the inserter controller in a compressed format;

a data pump configured to process compressed data from the journal and to transmit the processed data in a format suitable for a particular client, the data pump processing configuration including selecting a subset of data from the journal that is of interest to the particular client.

2. (original) The system of claim 1 wherein the journal storage system includes journal files, wherein each journal file stores data for a different mail run.

3. (original) The system of claim 2 wherein the journal storage system stores machine data for a plurality of inserter machines and each data element is associated with a journal thread within the journal files.

4. (original) The system of claim 3 wherein each journal thread is associated with a particular inserter machine.

5. (original) The system of claim 4 wherein the data stored in the journal storage system comprises event entries, thread context entries, and system information entries.

6. (previously presented) The system of claim 1 wherein the data pump is configured to determine whether clients are currently active.

7. (previously presented) The system of claim 6 wherein the data pump is configured to track what data has been transmitted to each client, and whereby if a particular client goes offline, the data pump is configured to resume transmittal at a point where transmittal was interrupted.

8. (previously presented) The system of claim 1 wherein the data pump is configured to translate the compressed data from the journal storage system to an XML format.

9. (original) A method for gathering and transmitting detailed inserter machine data to one or more clients, the method comprising:

gathering predetermined machine data comprising substantially all significant machine data from machine sensors and control routines;

storing gathered machine data in a compressed format;

processing compressed data from the journal and transmitting the processed data in a format suitable for a particular client, the processing including selecting a subset of data from the journal that is of interest to the particular client.

10. (original) The method of claim 9 wherein the step of storing includes storing data for different mail runs in different journal files.

11. (original) The method of claim 10 wherein the step of storing further includes storing machine data for a plurality of inserter machines and each data element is associated with a journal thread in the journal files.

12. (original) The method of claim 11 further including associating each journal thread with a particular inserter machine.

13. (original) The method of claim 12 wherein the step of storing includes storing data entries comprising event entries, thread context entries, and system information entries.

14. (original) The method of claim 9 further comprising determining whether clients are currently active.

15. (original) The method of claim 14 further comprising tracking what data has been transmitted to each client, and whereby if a particular client goes offline, resuming transmittal later in time at a point where transmittal was interrupted.

16. (original) The system of claim 9 further comprising translating the stored compressed data to an XML format prior to transmittal to a client.

35 U.S.C. § 102, Anticipation

Claims 1-5, 8-13 and 16 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,965,895 to Smith ("Smith"). Applicants traverse this rejection because the asserted reference fails to disclose or suggest recited elements and steps of the rejected claims.

The asserted reference is directed to a system for gathering data in a circuit chip fabrication facility and for performing detailed analysis on that data. Applicants note that Smith does not disclose or suggest a system using an "inserter controller" or a method for gathering "inserter machine" data, as recited in independent claims 1 and 9. The nature of the inserter controller and machine are significant in that the manner of handling and processing data gathered by such components is different that in the circuit manufacturing industry.

Another significant difference is that Smith does not disclose or suggest the "data pump" element for, or step for, "processing compressed data from the journal and transmitting the processed data in a format suitable for a particular client."

Smith provides elaborate techniques for processing the data, and further provides means for "providing access to the results." See e.g. Claim 1 of Smith. In contrast, the "data pump" element, and "processing" and "transmitting" steps affirmatively push the desired data to the client.

This feature is described in the present application:

> The data pump **2** takes responsibility for making sure that the correct data is transmitted to the clients **4**. This arrangement relieves the responsibility of retrieving data from the clients **4**. Since clients **4** may be comprised of a variety of different types of applications, without the data pump **2** is would be difficult to ensure that the clients **4** were reliably receiving information. Data pump **2** includes client drivers **8** and data link **9** to facilitate providing the individualized data needs to each of the clients **4**. Each client driver **8** ensures that the data is properly transmitted from the data pump **2**. Some clients **4** may receive information in a format suitable for a database, while others may receive text information. Data pump **2** ensures that the information is transmitted in the format most easily understood by the client **4**. Data pump **2** can provide journal data for all mail runs, and clients **4** can receive data for status changes as they happen.

See page 8, lines 6-17.

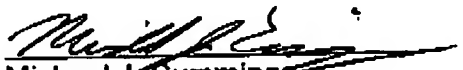
Thus it will be understood that the "data pump" element recited in claim 1 is not disclosed in Smith. Accordingly, it is submitted that these § 102(e)rejections should be withdrawn.

35 U.S.C. § 103, Obviousness

Claims 6-7 and 14-15 stand rejected under 35 U.S.C. § 103(a) as obvious over Smith in further view of U.S. Patent No. 6,990,497 to O'Rourke ("O'rourke"). O'Rourke is directed to a system for dynamic streaming media management, and does not cure deficiencies identified above with respect to Smith. Further, there is no suggest to combine the disclosure of O'Rourke with the disclosure of Smith to create anything covered by the rejected claims. Accordingly it is requested that these rejections be withdrawn.

For these reasons, the rejections of claims 1-16 should be withdrawn.

Respectfully submitted,



Michael J. Cummings
Reg. No. 46,650
Attorney of Record
Telephone (203) 924-3934

PITNEY BOWES INC.
Intellectual Property and
Technology Law Department
35 Waterview Drive
P.O. Box 3000
Shelton, CT 06484-8000